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15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 BENEDICT SPANO, an individual,) CASE NO.: 2:19-cv-02057-APG-NJK
18 Plaintiff,)
19 vs.) JOINT STIPULATION AND ORDER
20 LIBERTY MUTUAL INSURANCE) FOR (14) DAY EXTENSION OF TIME
21 COMPANY; DOES I –X, inclusive; and ROE) FOR PLAINTIFF'S RESPONSE TO
22 CORPORATIONS XI through XX, inclusive,) DEFENDANT'S PENDING MOTION
23 Defendants.) TO DISMISS PLAINTIFF'S
24) COMPLAINT (ECF #7)
25) [FIRST REQUEST]
26)
27)
28)

17 **COMES NOW**, Defendant, LIBERTY MUTUAL INSURANCE COMPANY
18 (hereinafter referred to as "Defendant"), by and through its attorneys, the law firm of
19 KOELLER, NEBEKER, CARLSON & HALUCK, LLP, and Plaintiff, BENEDICT SPANO
20 (hereinafter "Plaintiff"), by and through his counsel of record, Brian E. Lunt, Esq. of
21 EDWARD M. BERNSTEIN & ASSOCIATES, and hereby submit this Joint Stipulation and
22 Order to Extend the deadline for Plaintiff's response to the pending Motion to Dismiss by
23 Defendant (ECF #7.) The parties' request the time for Plaintiff to respond to the pending
24 Motion to Dismiss Plaintiff's Complaint shall be extended by fourteen (14) days, and
25 Plaintiff's response would be due to the Court no later than January 2, 2020. The extension of
26 time requested by the parties herein is due to the parties' ongoing communications for
27 potential resolution of the matter by non-judicial means, and the extension requested herein is
28

1 intended to permit the parties to complete their communications in that regard prior to
2 expiration of the extended deadline for Plaintiff to respond to the Motion to Dismiss.

3 DATED this 18th day of December, 2019.

DATED this 18th day of December, 2019.

4 KOELLER NEBEKER CARLSON
& HALUCK, LLP

EDWARD M. BERNSTEIN & ASSOCIATES

6 By: /s/Andrew C. Green
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By: /s/Brian E. Lunt
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10 **ORDER**

11 Consistent with the foregoing stipulation, the parties' joint request to extend the time
12 for Plaintiff to respond to the pending motion to dismiss Plaintiff's Complaint (ECF #7) by
13 fourteen (14) days IS GRANTED. Any response by Plaintiff will be due to the Court no later
14 than January 2, 2020.

15 
16 UNITED STATES DISTRICT JUDGE
17 Dated: December 18, 2019.

18 Respectfully submitted by:

19 KOELLER NEBEKER CARLSON
& HALUCK, LLP

20 By: /s/Andrew C. Green
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